

7.1. A protected disclosure (whistleblowing) is different from

- 8.2. For the worker's disclosure to be protected by PIDA, it should be made to the right person and in the right way. The worker must reasonably believe that the information is substantially true. The worker must clearly state in writing that the information is being provided under PIDA and the Whistleblowing Policy.
- 8.3. Anyone wishing to raise a concern is encouraged to put their name to their allegation. Anonymous disclosures are less powerful and more difficult to investigate, but will be considered by Institute in the context of the following:

The seriousness of the disclosure.

The credibility of the concern.

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- 12.1. An individual can make a disclosure to the contacts at the Institute noted in 9.3 without following this procedure, or at any point in the procedure, if:
- They reasonably believe that they will be victimised if they raise the matter at a lower level or have suffered an identifiable detriment.
 - They reasonably believe that evidence is likely to be concealed or destroyed.
 - They have previously raised their concern at a lower level without a satisfactory outcome.
- 12.2. The individual should provide an overview of the issue(s) and
- Any action they have taken to date to resolve the issue or to follow the Whistleblowing Policy.
 - Why they feel they cannot, or are unable to continue to, raise the issue at a lower level.
- 12.3. Individuals who wish to seek free independent advice can contact:
- The charity Protect (formerly Public Concern at Work) on 0203 117 2520 or via their website www.protect-advice.org.uk
 - The National Audit Office (NAO) on 0207 798 7999 or visit their website www.nao.org.uk/contact-us/whistleblowing-disclosures/
 - BASIL (The Biomedical and Animal Science Integrity Line) on 05603 495014, quoting the Institute's unique reference number: 8QK451EN
 - The Charity Commission, by emailing whistleblowing@charitycommission.gov.uk
- 12.4. Staff and Research Fellows (honorary) can also contact the Employee Assistance Programme (EAP) on 0800 030 5182 (www.healthassuredeap.com).
- 12.5. Further information on whistleblowing and routes for raising a concern can be found on the gov.uk website.
- 13.1. If an individual suspects wrongdoing whilst working for or based at an outside organisation, they should use the internal procedures and / or whistleblowing policy of that organisation, contacting the organisation's HR team if necessary. The individual can also seek support and / or advice from their line manager if they are unsure how they should proceed with a complaint in an external organisation
- 13.2. Where appropriate, whistleblowing incidents relating to Research Fellows (Honorary), Honorary Members of Faculty, visiting students, visiting researchers and workers (including consultants and secondees), workers provided by a third party or contractors may be referred to their employer by the COO or Head of HR for appropriate action.

Maintaining a whistleblowing register. This will include all monitoring and handling of reports.

The Investigating Officer is appointed by HR. They should:

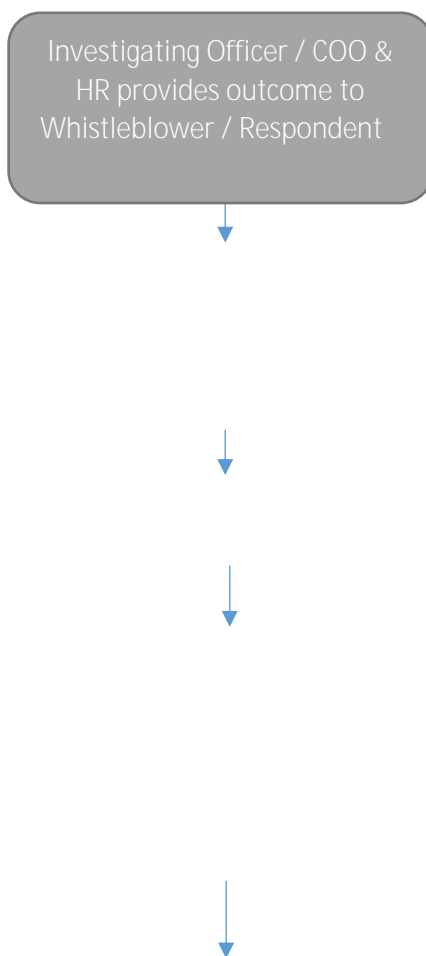
- Fairly and objectively carry out a full investigation.
- When the investigation is concluded, send the findings to HR.
- Assess the effectiveness of the process and liaise with HR in relation to any amendments that might be required and ensure these are implemented.
- Provide any assistance that may be required in ensuring that any lessons learnt are recorded, disseminated and implemented.

The Chief Operating Officer is responsible for:

- Fairly reviewing the handling of whistleblowing cases and any actions taken as a result.
- Working with HR to ensure that associated lessons learnt are recorded, disseminated and implemented.
- In the case of involvement of HR in the protected disclosure, taking on HR's responsibilities for the investigation and any subsequent procedures.
- Informing the Institute Director, Audit Committee or Board of Trustees of whistleblowing cases as appropriate.
- Working with the Communications Manager to respond to any press requests.

The Fraud and Bribery Policy (BI-COR-007) is supplementary to this response plan for cases of actual or suspected fraud or bribery.

In the case of involvement or a conflict of interest



People / organisation

Process

Decision point